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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF WITHDRAWAL OF OBJECTION OF DEBTOR
GAWKER MEDIA LLC TO PROOF OF CLAIM NO. 269 FILED BY
ASHLEY TERRILL, AND MOTION TO APPLY FED. R. CIV. P. 12(B)(6)
AND 12(C), PURSUANT TO BANKRUPTCY RULES 9014 AND 7012**

TO THE CLERK OF THE COURT:

PLEASE TAKE NOTICE on September 28, 2016, Ashley Terrill filed claim No. 269 against Gawker Media LLC ("Gawker Media").

PLEASE TAKE FURTHER NOTICE that on October 31, 2016, Gawker Media filed the *Objection of Debtor Gawker Media LLC to Proof of Claim No. 269 Filed by Ashley Terrill*

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

and Motion to Apply Fed. R. Civ. P. 12(B)(6) and 12(C), Pursuant to Bankruptcy Rules 9014 and 7012 [Docket No. 399] (the “Claim Objection”).

PLEASE TAKE FURTHER NOTICE that on December 22, 2016, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* [Docket No. 638] (the “Confirmation Order”), confirming the Debtors’ *Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* [Docket No. 638, Exhibit 1] (as may be subsequently amended or modified, the “Plan”).

PLEASE TAKE FURTHER NOTICE that the Debtors and Ms. Terrill executed the settlement agreement attached as exhibit E to the Plan Supplement² (the “Terrill Claims Settlement”), which settles the Terrill Claims. Pursuant to the Terrill Claims Settlement and section 4.01(d) of the Plan, (i) Gawker Media agreed to pay Ms. Terrill \$500,000 in Cash, (ii) the Terrill Claims were deemed Allowed in such amount solely for purposes of voting on the Plan, and (iii) Ms. Terrill waived any entitlement to Distributions from the Gawker Media Contingent Proceeds Creditor Account. The Court approved the Terrill Claims Settlement pursuant to paragraphs 48 and 56 of the Confirmation Order.

PLEASE TAKE FURTHER NOTICE that on December 28, 2016, Gawker Media made a distribution of \$500,000 in respect of the Terrill Claims Settlement. Accordingly, the Claim Objection is resolved as moot.

[Remainder of this page intentionally left blank]

² Any capitalized term not defined in this Notice shall have the meaning ascribed to such term in the Plan.

PLEASE TAKE FURTHER NOTICE that Gawker Media hereby withdraws the Claim
Objection.

Dated: January 23, 2017
New York, New York

/s/ Gregg M. Galardi
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